

61. Wireless service is available from multiple providers throughout Verizon's service areas. Verizon identified the areas served by wireless carriers in each Verizon's top 50 MSAs by examining wireless carriers' coverage maps listed on their websites and then mapped these areas by MSA. These maps are labeled Map C (Attachment O). These maps show that wireless service is widely available from multiple providers throughout the 50 top MSAs where Verizon provides local telephone services as the incumbent.

62. Verizon has also prepared maps that show the geographic areas that are served or could be served by VoIP, wireless service or competitive switches. *See* Attachment O, Maps A. The geographic areas that could be served by more than one competitor were color-coded on Maps A to show the number of competitors that are serving or could serve each area in the MSA. For purposes of these maps, the areas that could be served by VoIP are shown as served by only one carrier even though there are many providers from which customers in those areas could purchase VoIP service.

63. Wireless service is directly competitive with wireline service. As explained above, Verizon has prepared charts that compare the voice telephone service offerings of several leading competitors, including wireless offerings, for each of Verizon's 50 top MSAs. *See* Exhibit 2. The service packages listed on the charts are those most prominently featured in advertising materials and are most comparable between service providers.

64. Wireless carriers were the first to offer rate packages that included local and long-distance calls. Wireline and cable companies then responded to those wireless rate packages. As the attached charts show, wireless service is now fully competitive

with wireline service with respect to price. See Exhibit 2. One Wall Street analyst notes that “[w]ireless pricing dropped below wireline pricing in 2003 for the first time.”⁸⁷

65. The FCC itself and many other analysts have reached the same conclusion. In its 2004 CMRS Competition Report, the Commission found that trends which include “a decrease in the number of residential access lines, a drop in long distance revenues, and a decline in payphone profits” continued, noting an analyst’s statement that “wireless cannibalization remains a key driver of access line erosion.”⁸⁸

66. Wireless prices have declined – by as much as 10 to 20 percent a year in recent years.⁸⁹ Wireless providers also have increased the number of off-peak minutes they make available on their plan. As a result, many consumers now view wireless long distance service as effectively “free.”⁹⁰

67. In addition to competitive pricing, consumers now report high levels of satisfaction with the quality of their wireless service. For example, a GAO survey found that 83 percent of wireless users were satisfied with the call quality of their cell phone,

⁸⁷ V. Grover, Needham, *New Year’s Resolution – Avoid the Bells* at 1 (Dec. 29, 2003).

⁸⁸ *Ninth CMRS Report* ¶ 213 (citing Frank Governali, Goldman Sachs).

⁸⁹ See, e.g., *Ninth CMRS Report*, Appendix A at Table 9 (showing average revenue per minute declining every year since 1995 (1998: 21%; 1999: 23%; 2000: 20%; 2001: 30%; 2002: 9%; 2003: 13%)).

⁹⁰ F. Louthan, Vice President, Equity Research, Raymond James Financial, Inc., prepared witness testimony before the Subcommittee on Telecommunications and the Internet of the House Committee on Energy and Commerce, Washington, DC (Feb. 4, 2004) (“We believe consumers now view wireless long distance as free and are therefore more likely to use their wireless phone to make long distance calls.”); V. Shvets, *et al.*, Deutsche Bank, *AT&T Corporation: Irrational Exuberance, Rating Downgraded* at 2 (Jan. 9, 2004) (“The aggressive bundling by the RBOCs and nationally based wireless pricing has essentially killed consumer long-distance as a stand-alone product. It is no longer a question of whether but rather how quickly consumer long-distance revenue will essentially disappear.”).

while only 9 percent were dissatisfied.⁹¹ Analysts similarly report that “[c]ultural awareness and acceptance of wireless as an acceptable/preferred communication medium is growing.”⁹² Wireless has gained a general level of acceptance among consumers.

Other Sources of Intermodal Competition.

68. E-mail and instant messaging (IM) also now substitute for a large fraction of traffic switched on wireline networks.⁹³ A large and growing fraction of this traffic originates and/or terminates on competitive networks, but even when carried over the incumbents’ network, such traffic displaces significant usage-sensitive (e.g., per-minute or per call) revenues that incumbents otherwise would receive.

69. According to various research firms, U.S. users dispatch approximately 9 billion messages per day.⁹⁴ If only 5 percent of these substitute for a 90-second voice

⁹¹ General Accounting Office, *FCC Should Include Call Quality in Its Annual Report on Competition in Mobile Phone Services* at 27, Report No. GAO-03-501 (Apr. 2003).

⁹² S. Ellison, IDC, *U.S. Wireless Displacement of Wireline Access Lines Forecast and Analysis, 2003-2007* at Table 1 (Aug. 2003).

⁹³ See D. Schoolar, In-Stat/MDR, *State of the US Carrier Market* at 6 (Oct. 2003) (“Consumers are using e-mail and instant messaging in place of a phone call.”); C. Golvin, *et al.*, Forrester, *Sizing U.S. Consumer Telecom*, at 19 n.5 (Jan. 2002) (“[a]lternate forms of communications, such as email and instant messaging, []reduce long-distance minutes of use.”).

⁹⁴ See K. Thies, *E-mails and Records Management in the Legal Environment*, Legal Tech Newsletter (Nov. 14, 2003) (“Almost 9 billion e-mails are sent every day in the United States.”); see also B. Silverman, *IM Viruses Are Latest Threat to the Networks*, New York Post (June 13, 2004) (“Almost 80 million Americans use instant-messaging services at home or work, according to an April 2004 Nielsen/NetRatings survey.”); E. Stein, *Will IM Pay?*, CFO Magazine (May 2004) (“Radicati Group, a technology market research specialist, reckons there are already 60 million business IM accounts. IM could have as many as 182 million business users by 2007, claims Ferris Research.”).

call, this data traffic has displaced more than 10 percent of the voice traffic that would otherwise have been handled by the incumbents' networks.⁹⁵

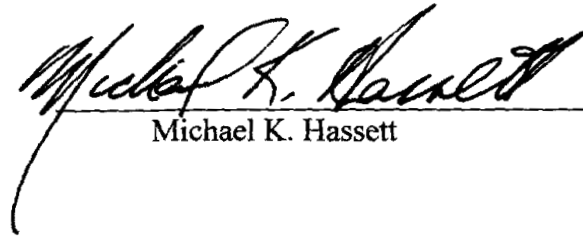
III. Conclusion

70. Recent technological and market developments demonstrate that competitors are not impaired without unbundled access to local switching. Competitors have significantly deployed their own facilities and are already providing significant and widespread competition for mass market local telephone services without using Verizon's unbundled local switching services. In fact, competitors are providing such competitive services without using circuit switches at all. Accordingly, competing carriers can provide voice service to the mass market and are not impaired without access to incumbent carriers' local circuit switches.

⁹⁵ Ind. Anal. & Tech. Div., WCB, FCC, *Trends in Telephone Service* at Table 10.1 (Aug. 2003) (Total 2001 Dial Equipment Minutes of 4.8 trillion divided by 2 yields 2.4 trillion conversation minutes; 246 billion/2.4 trillion = 10.3%) (5 percent of 9 billion is 450 million multiplied by 365 days yields 164 billion multiplied by 1.5 (90 seconds) yields 246 billion minutes annually).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

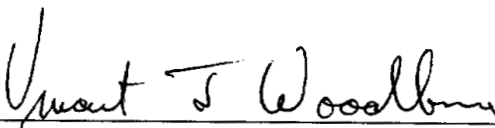
Executed on October 1, 2004

A handwritten signature in black ink, appearing to read "Michael K. Hassett", is written over a horizontal line. A long, sweeping vertical stroke extends downwards from the left side of the signature.

Michael K. Hassett

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 1, 2004



Vincent J. Woodbury

**DECLARATION OF MICHAEL K. HASSETT AND
VINCENT J. WOODBURY**

EXHIBIT 1

**Cable Telephony Deployment in Verizon's Service Areas
in States in Verizon's Top 50 MSAs**

Provider	State	Homes Passed in Counties Served by Verizon*	Cable Telephony Currently Available in Counties Served by Verizon by Numbers of Homes Passed*
Comcast	California	3.1 million	Circuit-Switched (1.2 million in Los Angeles Co., 84,000 in Orange Co.)
	District of Columbia	289,000	
	Delaware	206,000	
	Florida	267,000	
	Illinois	310,000	Circuit-Switched (260,000 in Chicago MSA)
	Indiana	649,000	
	Massachusetts	2.2 million	Circuit-Switched (1.6M in Boston MSA)
	Maryland	1.8 million	
	New Hampshire	n/a	Circuit-Switched
	New Jersey	1.6 million	
	Oregon	730,000	Circuit-Switched (648,000 in Portland MSA)
	Pennsylvania	2.4 million	Circuit-Switched (730,000 in Pittsburgh MSA)
	Texas	660,000	Circuit-Switched (660,000 in Dallas MSA)
	Virginia	523,000	Circuit-Switched (170,000 in Richmond MSA, 348,000 in Northern VA)
	Washington	1.2 million	Circuit-Switched (689,000 in Seattle MSA)
	West Virginia	58,000	
	Wisconsin	18,000	
Time Warner	California	771,000	VoIP (579,000 in Los Angeles MSA)
	Florida	56,000	
	Indiana	45,000	
	Maine	157,000	VoIP (145,000 in Portland MSA)
	Massachusetts	34,000	
	New Hampshire	22,000	
	New Jersey	77,000	VoIP (77,000 in Bergen and Hudson counties)
	New York	3.5 million	VoIP (367,000 in Albany MSA, 89,000 in Binghamton MSA, 40,000 in Ithaca MSA, 2.0 million in New York MSA, 82,000 in Rochester MSA, 257,000 in Syracuse MSA)
	North Carolina	169,000	VoIP (55,000 in Charlotte MSA, 104,000 in Durham MSA)
	Pennsylvania	236,000	

Provider	State	Homes Passed in Counties Served by Verizon*	Cable Telephony Currently Available in Counties Served by Verizon by Numbers of Homes Passed*
	Texas	2.6 million	VoIP (134,000 in Austin MSA, 1.5 million in Houston MSA, 565,000 in San Antonio MSA)
	West Virginia	34,000	
	Wisconsin	153,000	VoIP (40,000 in Milwaukee MSA)
Cablevision	Connecticut	232,000 (Fairfield Co.)	VoIP (232,000 in Fairfield Co.)
	New Jersey	1.2 million	VoIP (1.2 million statewide)
	New York	2.4 million	VoIP (2.4 million statewide)
Charter	California	1.2 million	
	Delaware	9,200	
	Illinois	142,000	
	Indiana	48,000	
	Maryland	55,000	
	Massachusetts	284,000	
	New Hampshire	6,900	
	New York	37,000	
	North Carolina	95,000	
	Oregon	111,000	
	Texas	560,000	
	Vermont	25,000	
	Virginia	109,000	
	Washington	143,000	
	West Virginia	279,000	
	Wisconsin	571,000	VoIP (38,000 in Wausau MSA, 167,000 in Dane Co.)
Cox	California	537,000	Circuit-Switched (306,000 in Orange Co.)
	Massachusetts	1,300	
	North Carolina	800	
	Rhode Island	356,000	Circuit-Switched (356,000 statewide)
	Texas	317,000	
	Virginia	1.1 million	VoIP (77,000 in Roanoke MSA) Circuit-Switched (377,000 in Northern VA, 621,000 in Virginia Beach MSA)
Total for 5 MSOs		more than 33 million	more than 18 million

Provider	State	Homes Passed in Counties Served by Verizon*	Cable Telephony Currently Available in Counties Served by Verizon by Numbers of Homes Passed*
<p>*Homes passed in counties served by Verizon. Data for MSAs where cable telephony is available also reflect only counties served by Verizon.</p> <p>Sources: Media Business Corp., <i>Top 10 MSOs by County</i> (Mar. 2004) (homes passed). Comcast. Media Business Corp., <i>Top 10 MSOs by County</i> (Mar. 2004) (states); Kagan, <i>Future of Cable Telephony</i> at 13 (Oct. 2003) (telephony availability) (“<i>Kagan Future of Cable Telephony</i>”); Comcast State Tariffs, available at http://www.comcast.com/Products/Telephony/Policies.ashx?LinkID=63 (telephony availability); CED inDepth, <i>Advanced Services Deployment Handbook</i> at 14 (Mar. 2004) (telephony availability). Time Warner. Time Warner Cable, <i>About Us</i>, http://www.timewarnercable.com/corporate/aboutus/?menu=Aboutus (states); Time Warner Cable News Release, <i>Time Warner Cable Launches Phone Service in Charlotte</i> (June 4, 2004) (telephony availability); Time Warner Cable Raleigh-Durham-Fayetteville, <i>Digital Phone: New Residential Phone Service</i>, http://www.twcnc.com/digital_phone/index.cfm (telephony availability); Time Warner Cable, <i>Time Warner Cable Albany Plan Details</i>, http://www.twcdigitalphone.com/albany/friendlies/plandetails.htm (telephony availability); Time Warner Cable, <i>Time Warner Cable Rochester NEW Residential Phone Service</i>, http://www.twcdigitalphone.com/rochester/ (telephony availability); Time Warner Cable, <i>Digital Phone: Time Warner Cable NEW Residential Phone Service</i>, http://twcny.com/digitalPhone/index.cfm?ThankYou=One (telephony availability); Time Warner Cable, <i>Time Warner Cable of New York and New Jersey Plan Details</i>, http://www.twcdigitalphone.com/newyork/plandetails.htm (telephony availability); Time Warner Cable, <i>Digital Phone</i>, http://www.digitalphonela.com/ (telephony availability); Time Warner Cable, <i>Time Warner Cable Binghamton NEW Residential Phone Service</i>, http://www.twcdigitalphone.com/binghamton/index.htm (telephony availability); Time Warner Cable, <i>Plan Details</i>, http://twcny.com/digitalPhone/planDetails.cfm (telephony availability); Time Warner Cable, <i>Time Warner Cable Houston NEW Residential Phone Service</i>, http://www.twcdigitalphone.com/houston/index.htm (telephony availability); Time Warner Cable, <i>Time Warner Cable San Antonio NEW Residential Phone Service</i>, http://www.twcdigitalphone.com/sa/index.htm (telephony availability); Time Warner Cable of Southeastern Wisconsin, <i>Digital Phone</i>, http://www.timewarnercable.com/milwaukee/products/digitalphones/default.html?menu=Products&Services (telephony availability). Cablevision. Cablevision Systems, <i>Corporate: Cable and Communication</i>, http://www.cablevision.com/index.jhtml?pageType=cable_comm (states). Charter. Charter Communications, <i>Our Markets</i>, http://www.charter.com/aboutus/ourstory/markets.asp (states); CED inDepth, <i>Advanced Services Deployment Handbook</i> at 14 (Mar. 2004) (telephony availability); J. Newman, <i>A Long Way From the Rotary Phone: Voice Over Internet Protocol is Hottest New Way to Talk</i>, Wisconsin State J. (Sept. 5, 2004) (telephony availability). Cox. Cox Communications, <i>Cox Communications</i>, http://www.cox.com; Cox Communications, Form 10-K (SEC Filed Feb. 27, 2004) (states); Kagan <i>Future of Cable Telephony</i> (telephony availability).</p>			

DECLARATION OF MICHAEL K. HASSETT AND
VINCENT J. WOODBURY

EXHIBIT 2

Competitive Prices for Mass Market Voice Telephone Service

There are many competitors offering mass market voice telephone service in Verizon's top 50 MSAs without using unbundled local switching and their offerings are priced at levels that are comparable to or below Verizon's voice telephone package rate. For each of these MSAs, Verizon has prepared a table that compares the prices and features of the voice telephone service offerings of several leading competitors, including VoIP offerings, wireless offerings and circuit switched offerings. Verizon prepared these tables by examining the competitors' websites and other publicly available information. These comparisons show that mass market customers can obtain voice telephone service from several competitors at rates that are comparable to or lower than Verizon's rates.

NEW YORK

Comparison of Competitive Calling Bundle Prices and Features

	Circuit-Switched				VoIP ¹							Wireless			
	Verizon Freedom	RCN Megaphone	AT&T Call Rate USA	MCI Neighborhood Complete	Cablevision Optimum Voice	Time Warner Cable Digital Phone	Vonage Premium Unlimited	AT&T Call Vantage	VoicePulse America Unlimited	Packet8 Freedom Unlimited	Lingo Unlimited	Verizon Wireless America's Choice	Cingular Nation	AT&T Wireless (National)	T-Mobile Get More (National)
												800 mins	600 mins	600 mins	600 mins
Price	\$59.95	\$60.00	\$54.95	\$49.99	\$34.95 ²	\$39.95 ²	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$59.99	\$49.99	\$49.99	\$39.99
Local Calling	Unlimited											Included within Plan Minutes (plus unlimited nights and weekends)			
Local Toll Calling	Unlimited											Included within Plan Minutes (plus unlimited nights and weekends)			
Long Distance	Unlimited											Included within Plan Minutes (plus unlimited nights and weekends)			
Calling Features	5	4	4	5	7	3	13	11	16	6	12	5	5	4	5
Relies on UNE-P	No		Yes		No										

¹Requires broadband connection at additional cost.

²Cablevision also offers this package bundled with high-speed Internet and digital cable service for \$89.85 a month. Customers "are essentially receiving their voice service for free," according to Cablevision.

³Reflects the \$10 discount for customers subscribing to both Digital Cable and High-Speed Internet service.

WASHINGTON, DC

Comparison of Competitive Calling Bundle Prices and Features

	Circuit-Switched							VoIP ¹					Wireless			
	Verizon Freedom	StarPower Ultra unlimited Long Distance	Cox Unlimited Connections (Fairfax)	Comcast Connections Any Distance	AT&T One Rate USA	MCI Neighbor- hood Complete	Cavalier Unlimited	Vonage Premium Unlimited	AT&T CallVantage	Phonon	Packet8 Freedom Unlimited	Lingo Unlimited	Verizon Wireless America's Choice	Cingular Nation	AT&T Wireless (National)	T-Mobile Get More (National)
													800 mins	600 mins	600 mins	600 mins
Price	\$49.95	\$51.80	\$49.95	\$48.95	\$49.95	\$49.99	\$44.95	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$59.99	\$49.99	\$49.99	\$39.99
Local Calling	Unlimited												Included within Plan Minutes (plus unlimited nights and weekends)			
Local Toll Calling	Unlimited												Included within Plan Minutes (plus unlimited nights and weekends)			
Long Distance Calling Features	Unlimited												Included within Plan Minutes (plus unlimited nights and weekends)			
	5	4	11	3	4	5	8	13	11	10	6	12	5	5	4	5
Relies on UNE-P	No				Yes		No									

¹Requires broadband connection at additional cost.

PHILADELPHIA

Comparison of Competitive Calling Bundle Prices and Features

	Circuit-Switched					VoIP ¹						Wireless			
	Verizon Freedom	RCN Mequphone	AT&T One Rate USA	MCI Neighbor hood Complete	Cavalier Unlimited	Vonage Premium Unlimited	AT&T CallVantage	Phonon	VoicePulse America Unlimited	Packet8 Freedom Unlimited	Lingo Unlimited	Verizon Wireless America's Choice	Cingular Nation	AT&T Wireless (National)	T-Mobile Get More (National)
												\$39.99/mo.	\$39.99/mo.	\$39.99/mo.	\$39.99/mo.
Price	\$54.95	\$55.00	\$49.95	\$49.99	\$44.95	\$24.99	\$29.99	\$34.99	\$34.99	\$19.95	\$19.95	\$59.99	\$49.99	\$49.99	\$39.99
Local Calling	Unlimited											Included within Plan Minutes (plus unlimited nights and weekends)			
Local Toll Calling	Unlimited											Included within Plan Minutes (plus unlimited nights and weekends)			
Long Distance	Unlimited											Included within Plan Minutes (plus unlimited nights and weekends)			
Calling Features	5	4	4	5	8	13	11	10	16	6	12	5	5	4	5
Relies on UNE-P	No		Yes		No										

¹Requires broadband connection at additional cost.

BOSTON

Comparison of Competitive Calling Bundle Prices and Features

	Circuit-Switched					VoIP ¹						Wireless			
	Verizon Freedom	RCN Megaphone	Comcast Connections Any Distance	AT&T One Rate USA	MCI Neighbor- hood Complete	Vonage Premium Unlimited	AT&T CallVantage	VoicePulse America Unlimited	Packet8 Freedom Unlimited	Lingo Unlimited	BroadVoice Unlimited U.S.A.	Verizon Wireless America's Choice	Cingular Nation	AT&T Wireless (National)	T-Mobile Get More (National)
Price	\$54.95	\$55.00	\$48.95	\$49.95	\$55.99	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$19.95	\$59.99	\$49.99	\$49.99	\$39.99
Local Calling	Unlimited											Included within Plan Minutes (plus unlimited nights and weekends)			
Local Toll Calling	Unlimited											Included within Plan Minutes (plus unlimited nights and weekends)			
Long Distance	Unlimited											Included within Plan Minutes (plus unlimited nights and weekends)			
Calling Features	5	4	4	4	5	13	11	16	6	12	16	5	5	4	5
Relies on UNE-P	No			Yes		No									

¹Requires broadband connection at additional cost.

LOS ANGELES

Comparison of Competitive Calling Bundle Prices and Features

	Circuit-Switched					VoIP ¹					Wireless			
	Verizon Freedom	Comcast Connections Any Distance	AT&T One Rate USA	MCI Neighborhood Complete	Time Warner Cable Digital Phone	Vonage Premium Unlimited	AT&T CallVantage	VoicePulse America Unlimited	Packet8 Freedom Unlimited	Lingo Unlimited	Verizon Wireless America's Choice	Cingular Nation	AT&T Wireless (National)	T-Mobile Get More (National)
											500 mins	600 mins	600 mins	600 mins
Price	\$59.95	\$48.95	\$54.95	\$49.99	\$39.95	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$49.99	\$49.99	\$49.99	\$39.99
Local Calling	Unlimited										Included within Plan Minutes (plus unlimited nights and weekends)			
Local Toll Calling	Unlimited										Included within Plan Minutes (plus unlimited nights and weekends)			
Long Distance	Unlimited										Included within Plan Minutes (plus unlimited nights and weekends)			
Calling Features	5	4	4	5	2	13	11	16	6	12	5	5	4	5
Relies on UNE-P	No		Yes		No									

¹Requires broadband connection at additional cost. ²Reflects the \$10 discount for customers subscribing to both Digital Cable and High-Speed Internet service.

BALTIMORE

Comparison of Competitive Calling Bundle Prices and Features

	Circuit-Switched			VoIP ¹					Wireless			
	Verizon Freedom	AT&T One Rate USA	MCI Neighbor- hood Complete	Vonage Premium Unlimited	AT&T Call Vantage	VoicePulse America Unlimited	Packet8 Freedom Unlimited	Lingo Unlimited	Verizon Wireless America's Choice	Cingular Nation	AT&T Wireless (National)	T-Mobile Get More (National)
									800 min./mo.	600 min./mo.	500 min./mo.	400 min./mo.
Price	\$49.95	\$49.95	\$55.99	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$59.99	\$49.99	\$49.99	\$39.99
Local Calling	Unlimited								Included within Plan Minutes (plus unlimited nights and weekends)			
Local Toll Calling	Unlimited								Included within Plan Minutes (plus unlimited nights and weekends)			
Long Distance	Unlimited								Included within Plan Minutes (plus unlimited nights and weekends)			
Calling Features	5	4	5	13	11	16	6	12	5	5	4	5
Relies on UNE-P	No	Yes		No								

¹Requires broadband connection at additional cost.

TAMPA

Comparison of Competitive Calling Bundle Prices and Features

	Circuit-Switched		VoIP ¹							Wireless			
	Verizon Freedom	Z-Tel Z-Line HOME Unlimited	Bright House Networks Digital Phone	Vonage Premium Unlimited	AT&T CallVantage	VoicePulse America Unlimited	Packet8 Freedom Unlimited	Lingo Unlimited	BroadVoice Unlimited U.S.A.	Verizon Wireless America's Choice 500 mins.	Cingular Nation 500 mins.	AT&T Wireless (National) 500 mins.	T-Mobile Get More (National) 600 mins.
Price	\$48.95	\$64.99	\$39.95	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$19.95	\$49.99	\$54.99	\$49.99	\$39.99
Local Calling	Unlimited									Included within Plan Minutes (plus unlimited nights and weekends)			
Local Toll Calling	Unlimited									Included within Plan Minutes (plus unlimited nights and weekends)			
Long Distance	Unlimited									Included within Plan Minutes (plus unlimited nights and weekends)			
Calling Features	5	8	3	13	11	16	6	12	16	5	5	4	5
Relies on UNE-P	No	Yes	No										

¹Requires broadband connection at additional cost. ²Reflects the \$10 discount for customers subscribing to both Standard Cable and High-Speed Internet service.

RIVERSIDE

Comparison of Competitive Calling Bundle Prices and Features

	Circuit-Switched				VoIP ¹				Wireless			
	Verizon Freedom	AT&T One Rate USA	MCI Neighborhood Complete	Z-Tel Z-Line HOME Unlimited	Vonage Premium Unlimited	AT&T CallVantage	VoicePulse America Unlimited	Packet8 Freedom Unlimited	Verizon Wireless America's Choice	Cingular Nation	AT&T Wireless (National)	T-Mobile Get More (National)
									500 mins	500 mins	500 mins	500 mins
Price	\$59.95	\$49.95	\$49.99	\$49.99	\$24.99	\$29.99	\$34.99	\$19.95	\$48.99	\$49.99	\$49.99	\$39.99
Local Calling	Unlimited								Included within Plan Minutes (plus unlimited nights and weekends)			
Local Toll Calling	Unlimited								Included within Plan Minutes (plus unlimited nights and weekends)			
Long Distance	Unlimited								Included within Plan Minutes (plus unlimited nights and weekends)			
Calling Features	5	4	5	8	13	11	16	6	5	5	4	5
Relies on UNE-P	No	Yes			No							

¹Requires broadband connection at additional cost.

PITTSBURGH

Comparison of Competitive Calling Bundle Prices and Features

	Circuit-Switched					Voip ¹					Wireless				
	Verizon Freedom Unlimited	Comcast Any Distance	AT&T USA	MCI Megaphone Local Complete	Z-Tel Z-Live HOME Unlimited	Vonage Promotion Unlimited	AT&T CallVantage Unlimited	VoicePulse America Unlimited	Packet8 Freedom Unlimited	Lingo Unlimited	Verizon Wireless America Choice	Leap Cricket Unlimited	AT&T Wireless America Choice	T-Mobile Get More Unlimited (National)	
Price	\$54.95	\$49.95	\$49.95	\$49.99	\$49.99	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$49.99	\$49.99	\$49.99	\$39.99	
Local Calling						Unlimited									
Local Toll Calling						Unlimited									
Long Distance						Unlimited									
Calling Features	5	4	4	5	8	13	11	16	6	12	5	3	4	5	
Relies on UNE-P	No			Yes						No					

¹Requires broadband connection at additional cost.

PROVIDENCE

Comparison of Competitive Calling Bundle Prices and Features

	Circuit-Switched				VoIP ¹					Wireless			
	Verizon Freedom	Cox Unlimited Connection	AT&T One Rate USA	MCI Neighbor hood Complete	Verizon Premium Unlimited	AT&T CallVantage	VoicePulse America Unlimited	Packet8 Freedom Unlimited	Lingo Unlimited	Verizon Wireless America's Choice	Cingular Nation	AT&T Wireless (National)	T-Mobile (Get More (National))
										600 mins	600 mins	600 mins	600 mins
Price	\$54.95	\$39.95	\$54.95	\$55.99	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$59.99	\$49.99	\$49.99	\$39.99
Local Calling	Unlimited									Included within Plan Minutes (plus unlimited nights and weekends)			
Local Toll Calling	Unlimited									Included within Plan Minutes (plus unlimited nights and weekends)			
Long Distance Calling	Unlimited									Included within Plan Minutes (plus unlimited nights and weekends)			
Features	5	9	4	5	13	11	16	6	12	5	5	4	5
Relies on UNE-P	No		Yes		No								

¹Requires broadband connection at additional cost. ²Reflects the \$10 discount for customers subscribing to both Digital Cable and High-Speed Internet service.

VIRGINIA BEACH

Comparison of Competitive Calling Bundle Prices and Features

	Circuit-Switched					VoIP ¹					Wireless			
	Verizon Freedom	Cox Connection Unlimited (Hampton Roads)	AT&T One Rate USA	MCI Neighbor- hood Complete	Cavalier Unlimited	Vonage Premium Unlimited	AT&T CallVantage	Phonom	Packet8 Freedom Unlimited	Lingo Unlimited	Verizon Wireless America's Choice	ALLTEL National Freedom	SunCom UnPlan	T-Mobile Get More (National)
											800 mins	600 mins		600 mins
Price	\$49.95	\$49.95	\$49.95	\$49.99	\$44.95	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$59.99	\$45.00	\$50.00	\$39.99
Local Calling	Unlimited										Included within Plan Minutes (plus unlimited nights and weekends)			
Local Toll Calling	Unlimited										Included within Plan Minutes (plus unlimited nights and weekends)			
Long Distance	Unlimited										Included within Plan Minutes (plus unlimited nights and weekends)			
Calling Features	5	6	4	5	8	13	11	10	6	12	5	5	5	5
Relies on UNE-P	No		Yes		No									

¹Requires broadband connection at additional cost.

RICHMOND

Comparison of Competitive Calling Bundle Prices and Features

	Circuit-Switched					VoIP ¹					Wireless			
	Verizon Freedom	Comcast Connection Any Distance	AT&T One Rate USA	MCI Neighborhood Complete	Cavalier Unlimited	Vonage Premium Unlimited	AT&T CallVantage	Phonon	Packet8 Freedom Unlimited	Lingo Unlimited	Verizon Wireless America's Choice	ALLTEL National Freedom	SunCom UnPlan	T-Mobile Get More (National)
											800 mins	600 mins		600 mins
Price	\$49.95	\$49.95	\$49.95	\$49.99	\$44.95	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$59.99	\$45.00	\$50.00	\$39.99
Local Calling	Unlimited										Included within Plan Minutes (plus unlimited nights and weekends)			
Local Toll Calling	Unlimited										Included within Plan Minutes (plus unlimited nights and weekends)			
Long Distance Calling Features	Unlimited										Included within Plan Minutes (plus unlimited nights and weekends)			
	5	3	4	5	8	13	11	10	6	12	5	5	5	5
Relies on UNE-P	No		Yes		No									

¹Requires broadband connection at additional cost.

Comparison of Competitive Calling Bundle Prices and Features

¹Requires broadband connection at additional cost.

BUFFALO

Comparison of Competitive Calling Bundle Prices and Features

	Circuit-Switched				VoIP ¹				Wireless					
Verizon Freedom	AT&T One Rate USA	MCI Unlimited Complete	Z-Tel Z Line HOME Unlimited	Vonage Premium Unlimited	AT&T Call Vantage Unlimited	VoicePulse America Unlimited	Packet8 Freedom Unlimited	Lingo Unlimited	BroadVoice Unlimited U.S.A.	Verizon Wireless America's Choice	Cingular Nation 600 mins	AT&T Wireless (National) 600 mins	T-Mobile Get More (National) 600 mins	
Price	\$59.95	\$54.95	\$49.99	\$49.99	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$19.95	\$49.99	\$49.99	\$39.99	
Local Calling					Unlimited									
Local Toll Calling					Unlimited									
Long Distance					Unlimited									
Calling Features	5	4	5	8	13	11	16	6	12	16	5	5	4	5
Relies on UNE-P	No		Yes							No				

¹Requires broadband connection at additional cost.

SEATTLE

Comparison of Competitive Calling Bundle Prices and Features

	Circuit-Switched			VoIP ¹						Wireless			
	Verizon Freedom	Comcast Connect One Any Distance	MCI Neighborhood Complete	Vonage Premium Unlimited	AT&T CallVantage	voiceglo Unlimited	VoicePulse America Unlimited	Packet8 Freedom Unlimited	Lingo Unlimited	Verizon Wireless America's Choice	Cingular Nation	AT&T Wireless (National)	T-Mobile Got More (National)
										500 mins	600 mins	600 mins	600 mins
Price	\$64.95	\$49.99	\$55.99	\$24.99	\$29.99	\$29.99	\$34.99	\$19.95	\$19.95	\$49.99	\$49.99	\$49.99	\$39.99
Local Calling	Unlimited									Included within Plan Minutes (plus unlimited nights and weekends)			
Local Toll Calling	Unlimited									Included within Plan Minutes (plus unlimited nights and weekends)			
Long Distance Calling	Unlimited									Included within Plan Minutes (plus unlimited nights and weekends)			
Calling Features	5	4	5	13	11	6	16	6	12	5	5	4	5
Relies on UNE-P	No		Yes	No									

¹Requires broadband connection at additional cost.

WORCESTER

Comparison of Competitive Calling Bundle Prices and Features

	Circuit-Switched				VoIP ¹					Wireless			
	Verizon Freedom	AT&T One Rate USA	MCI Neighbor- hood Complete	Z-Tel Z4 One HOME Unlimited	Vonage Premium Unlimited	AT&T CallVantage	VoicePulse America's Unlimited	Packet8 Freedom Unlimited	Lingo Unlimited	Verizon Wireless America's Choice	Cingular Nation	AT&T Wireless (National)	T-Mobile Get More (National)
										800 mins	500 mins	500 mins	600 mins
Price	\$54.95	\$49.95	\$55.99	\$55.99	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$59.99	\$48.99	\$49.99	\$39.99
Local Calling	Unlimited									Included within Plan Minutes (plus unlimited nights and weekends)			
Local Toll Calling	Unlimited									Included within Plan Minutes (plus unlimited nights and weekends)			
Long Distance Calling Features	Unlimited									Included within Plan Minutes (plus unlimited nights and weekends)			
	5	4	5	8	13	11	16	6	12	5	5	4	5
Relies on UNE-P	No	Yes			No								

¹Requires broadband connection at additional cost.